

COPY

AO 91 (Rev. 11/82)

CRIMINAL COMPLAINT

UNITED STATES DISTRICT COURT		CENTRAL DISTRICT OF CALIFORNIA	
UNITED STATES OF AMERICA v. PHILIP JAMES LAYFIELD, aka Philip Samuel Pesin		DOCKET NO.	
		MAGISTRATE'S CASE NO. SAMJ 18-0070	
Complaint for violation of Title 18, United States Code, Section 1341: Mail Fraud			
NAME OF MAGISTRATE JUDGE HONORABLE STEVE KIM		UNITED STATES MAGISTRATE JUDGE	LOCATION Los Angeles, California
DATE OF OFFENSE From in or about February 2016 to the present	PLACE OF OFFENSE Orange County, and Elsewhere within the CDCA	ADDRESS OF ACCUSED (IF KNOWN) Tamarindo, Costa Rica	
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION: Beginning in or about February 2016, and continuing to the present, in Orange County, California, within the Central District of California, defendant PHILIP JAMES LAYFIELD, also known as Philip Samuel Pesin, knowingly and with intent to defraud, devised, participated in, and executed a scheme to defraud J.N. as to material matters and to obtain money and property from J.N. by means of false and fraudulent pretenses, representations, and promises, and for the purpose of executing and attempting to execute the above-described scheme to defraud, on or about March 9, 2016, caused a check (representing a partial, de minimus payment of funds owed to J.N.) to be placed in an authorized depository for mail matter to be sent and delivered by the United States Postal Service or a private or commercial interstate carrier, according to the directions thereon.			
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED: (See attached Affidavit which is incorporated herein by this reference as part of this Complaint)			
MATERIAL WITNESSES IN RELATION TO THIS CHARGE: N/A			
Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.		SIGNATURE OF COMPLAINANT MARK E. SPEIDEL <i>/s/</i>	
		OFFICIAL TITLE Special Agent – Homeland Security Investigations	
Sworn to before me and subscribed in my presence,			
SIGNATURE OF MAGISTRATE JUDGE ⁽¹⁾ STEVE KIM		DATE February 23, 2018	

⁽¹⁾ See Federal Rules of Criminal Procedure 3 and 54